

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MONIQUE DA SILVA MOORE,)	
MARYELLEN O'DONOHUE, LAURIE)	
MAYERS, HEATHER PIERCE, and)	
KATHERINE WILKINSON on behalf)	
of themselves and all others similarly)	
situated, and ZANETA HUBBARD,)	Civ No. 11-CV-1279 (ALC) (AJP)
on her own behalf,)	
)	
PLAINTIFFS,)	
)	
v.)	
)	
PUBLICIS GROUPE SA and)	
MSLGROUP,)	
)	
DEFENDANTS.)	
_____)	

PLAINTIFFS' NOTICE OF MOTION FOR CLASS CERTIFICATION

Pursuant to Rule 23 of the Federal Rules of Civil Procedure, Plaintiffs and Class Representatives Monique da Silva Moore, MaryEllen O'Donohue, Laurie Mayers, Heather Pierce, Katherine Wilkinson, and Zaneta Hubbard, by and through undersigned counsel, respectfully submit this Motion for Class Certification. This motion is based upon the Memorandum of Law, the Declaration of Siham Nurhussein in Support of Plaintiffs' Motion for Class Certification, exhibits attached thereto, and the applicable law.

DATED: July 12, 2013

SANFORD HEISLER, LLP

/s/ Janette Wipper

Janette Wipper, Esq.

Siham Nurhussein, Esq.

Tom Henderson, Esq.

Susan Rubenstein, Esq.

Attorneys for the Plaintiffs and the Class